



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Tom Sever, Treasurer  
Democratic Republican Independent  
Voter Education Committee  
25 Louisiana Avenue, NW  
Washington, DC 20001

AUG 19 1998

Identification Number: C00032979

Reference: June Monthly Report (5/1/98-5/31/98)

Dear Mr. Sever:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

•You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the

donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount that was deducted each pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category of the Detailed Summary Page	PAGE 1 OF 1	FOR LINE NUMBER 11(a)(1)
<b>Contributions from Individuals</b>						
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in Full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (the Period)	
Annie Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$90.00	
Receipt for <input type="checkbox"/> cash <input type="checkbox"/> property <input type="checkbox"/> services		Occupation Branch Manager		Aggregate Year-to-Date	(\$15 biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (the Period)	
Rodney Jones 881 Hamabury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00	
Receipt for <input type="checkbox"/> cash <input type="checkbox"/> property <input type="checkbox"/> services		Occupation Vice President		Aggregate Year-to-Date	(\$80 biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category of the Detailed Summary Page	PAGE 1 OF 1	FOR LINE NUMBER 11(a)(1)
<b>Contributions from Individuals</b>						
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in Full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (the Period)	
Martin L. Kross 4 River Road City, State ZIP		National Organization, Inc.		8/12/84	\$5,888.00	
Receipt for <input type="checkbox"/> cash <input type="checkbox"/> property <input type="checkbox"/> services		Occupation Chairman		Aggregate Year-to-Date	(\$5,888.00) (IN-KIND CONTRIBUTION)	

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Detailed Summary Page	PAGE 1 OF 1	FOR LINE NUMBER 21(b)
<b>Operating Expenditures/Other Federal</b>						
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in Full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement (the Period)	
Martin L. Kross 4 River Road City, State ZIP		raffle prize		8/19/84	\$5,888.00	
		Disbursement for <input type="checkbox"/> property <input type="checkbox"/> services <input type="checkbox"/> other agency			(IN-KIND CONTRIBUTION)	

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

